



Federal Communications Commission
Washington, D.C. 20554

April 30, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Consumer Information and Disclosure Public Notice CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36,

Dear Ms. Dortch:

On April 25, 2012, ISPs and representatives of other organizations and companies met with members of the Commission to discuss issues associated with the Commission's 2012 broadband measurement and performance program in the ng Measurement Architecture Standardization and Outreach Group. The meeting focused on discussion of a draft document for the group describing the mission statement, potential performance metrics and high-level architecture, as well as, the first steps required to begin a standards process to instantiate elements of the proposal. A full list of meeting attendees and the draft document is attached to this filing.

In commenting on the document, Tom Anschutz indicated that the proposal could entail the risk of the Heisenberg Principle, in that extensive performance measurements could, themselves, impact performance. He proposed that a passive server based metric collection approach focused on end-to-end quality of experience could both complement and independently validate a sampling based approach using active measurement.

A representative of CenturyLink indicated a concern that customer access to active measurement approaches could, in some circumstances, impact network performance. Walter Johnston, Office of Engineering and Technology, noted that if properly implemented, active measurements from the customer service point could provide a customer service test that would lower overall support costs and that consideration should be given both to operational use of such metrics as well as for reporting purposes.

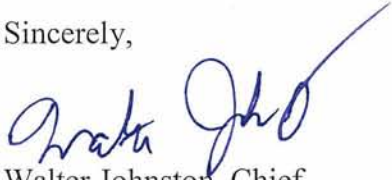
It was agreed that proposed suggestions and changes to the baseline document should be submitted in writing to James Miller, Office of Engineering and Technology, to provide an accurate revision record. Comments received within the next two weeks would be incorporated into the draft document for discussion at the next meeting.

Ken Koh reported on discussions within the Broadband Forum on related issues and expressed a view that the forum may be an appropriate place to standardize on overall architectural elements. Tom Anschutz described the membership and activities of the Broadband Forum for the group.

Walter Johnston noted that Henning Schulzrinne, FCC Chief Technologist, had volunteered to undertake a similar effort with the IETF on performance metrics and reported some initial discussions with the IETF. It was suggested that the IP Performance Metrics (ippm) was the target working group within the IETF for such discussions. Meredith Whitaker asked whether the work in this area was going to be coordinated with other regulatory authorities such as the OECD, noting the OECD/FCC workshop related to this subject held last year at the FCC. Walter Johnston indicated that it would be a goal to align ongoing work within the Commission with other regulatory authorities, and noted that the intent of the joint workshop was to facilitate dialogue among regulatory authorities on the subject.

The meeting concluded with a general agreement to proceed with discussions with both the IETF and the Broadband Forum to identify interest in undertaking the work discussed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter Johnston", with a long, sweeping flourish extending from the end of the name.

Walter Johnston, Chief
Electromagnetic Compatibility Division/OET

Attendees

Name	Organization
Tom Anschutz	ATT
Ken Koh	Adtran
Jeb Benedict	Centurylink
Michael Bugenhagen	Centurylink
Russ Gyurek	Cisco
James Miller	FCC
Jose Trevino	FCC
Walter Johnston	FCC
Meredith Whittaker	Google/M-Lab
David Horne	Intel
Shane Amante	Level3
Steve Bauer	MIT
Jim Partridge	NCTA
Thomas Gideon	New America/M-Lab
Ariela Fish	SamKnows
Neil Campell	SamKnows
Sam Crawford	SamKnows
Jason Weil	Timewarner Cable
David Young	Verizon
Kitty O'Hara	Verizon